

**RECEIVED
CENTRAL FAX CENTER****MAY 22 2007****Remarks**

Applicants respectfully request reconsideration of this application as amended. No claims have been amended. No claims have been canceled. Therefore, claims 1, 4-5, 7-10 and 16-22 are now presented for examination.

Claims 1 and 7 stand rejected under 35 U.S.C. §102(e) as being anticipated by Step III (U.S. Patent No. 6,487,463). In addition, claims 4 and 5 stand rejected under 35 U.S.C. §103(a) as being anticipated by Step III (U.S. Patent No. 6,487,463). Applicants submit that the present claims are patentable over Stepp.

Stepp discloses a system for actively cooling an electronic device. See Stepp at Abstract. Stepp further discloses a controller 320 that is coupled to temperature sensors 314 and cooling fans 316. The controller 320 monitors the temperature of components 302-312 through the temperature sensors 314. See Stepp at col. 6, ll. 14-19 and Figure 3. The controller 320 is coupled to cooling fans 316 via FAN C and FAN M connections. The FAN C connections are used to control the rotational speed of each cooling fan 316. See Stepp at col. 6, ll. 22-24. The FAN M connections are used to monitor each cooling fan 316 to detect failure of a cooling fan. See Stepp at col. 6, ll. 56-58.

Claim 1 of the present application recites:

A system comprising:
a first set of field replaceable units each being of a first type;
a second set of field replicable units each being of a second type;
a first management bus, directly coupled to each of the first set of field replaceable units, wherein the first management bus is coupled only to field replicable units of the first type;
a second management bus, directly coupled to each of the second set of field replaceable units, wherein the

second management bus is coupled only to field replaceable units of the second type;

a central management agent, coupled to the first management bus and the second management bus, to monitor each of the first and second sets of field replaceable units via the first and second management buses, and to transmit signals to control each of the first and second sets of field replaceable units via the first and second management buses; and

a communication link, coupled to the central management agent, to transmit signals received from the central management agent indicating failure of one or more of the first set of field replaceable units, and the second set of field replaceable units to a remote location.

Applicants submit that there is no disclosure or suggestion is Stepp of a central management agent transmitting signals control to both the temperature sensors and the fans. Particularly, Stepp does not disclose or suggest transmitting control signals to the temperature sensors. In the Office Action, the Examiner maintains that because the temperature sensors and fans are both coupled to a controller, the controller therefore transmits control signals. See Office Action at page 8, paragraph 23.

Applicants do not disagree that Stepp discloses transmitting signals to the fans to control the speed of the fans. Nonetheless, there is **no disclosure of transmitting signals to the temperature sensors**, in the Stepp reference. Therefore, Stepp cannot disclose, and does not reasonably suggest, transmitting signals to control each of first and second sets of field replaceable units via first and second management buses. Thus claim 1, and its dependent claims, is patentable over Stepp.

Claim 16 recites:

A system comprising:
two or more temperature sensors;
a first management bus directly coupled to each of
the two or more temperature sensors, wherein the first

management bus is coupled only to temperature sensors;

two or more fan trays;

a second management bus directly coupled to each of the two or more fan trays, wherein the second management bus is coupled only to fan trays;

a central management agent, coupled to the first management bus and the second management bus, to monitor the temperature sensors and the fan trays via the first and second management buses, and to transmit signals to control activation of one or more of the fan trays based upon signals received from one or more of the temperature sensors via the first and second management buses, and having failure detection logic to detect a failure of the temperature sensors, and the fan trays; and

a network interface card coupled to the central management agent, to transmit signals received from the central management agent indicating failure of one or more of the temperature sensors, and the fan trays to a remote location.

Applicant submits that nowhere in Stepp is there disclosed or suggested a process of *detecting a failure of temperature sensors*. Stepp only discloses detecting a failure in one of the cooling fans. Thus, claim 16 is patentable over Stepp. Because claims 17-22 depend from claim 16 and include additional features, claims 17-22 are also patentable over Stepp.

Claims 8-10 and 16-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Stepp, in view of Holland (U.S. Patent No. 5,367,669). Applicants submit that the present claims are patentable over Stepp in view of Holland.

Holland discloses a fault tolerant disk array control system. See Holland at Abstract. However, Holland does not disclose or suggest a central management agent transmitting signals control to temperature sensors and fans, or detecting a failure of temperature sensors.

As discussed above, Stepp does not disclose or suggest such features. Since neither Stepp nor Holland disclose or suggest a central management agent transmitting signals

control to temperature sensors and fans, or detecting a failure of temperature sensors, any combination of Stepp and Holland would not disclose the features. Therefore, the present claims are patentable over Stepp in view of Holland.

Claim 22 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Step and Holland, and in further view of Jewett et al. (U.S. Patent No.6,073,251). Applicants submit that the present claims are patentable over Stepp in view of Jewett.

Jewett discloses a computer system with a fault tolerant configuration. See Jewett at Abstract. However, Jewett does not disclose or suggest a central management agent transmitting signals control to temperature sensors and fans, or detecting a failure of temperature sensors.

As discussed above, Stepp and Holland both fail to disclose or suggest such features. Since neither Stepp, Holland nor Jewett disclose or suggest a central management agent transmitting signals control to temperature sensors and fans, or detecting a failure of temperature sensors, any combination of Stepp, Holland and Jewett would also not disclose the features. Therefore, the present claims are patentable over the combination of Stepp, Holland and Jewett.

Applicants submit that the rejections have been overcome and that the claims are in condition for allowance. Accordingly, applicants respectfully request the rejections be withdrawn and the claims be allowed.

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP



Date: May 22, 2007

Mark L. Watson
Reg. No. 46,322

12400 Wilshire Boulevard
7th Floor
Los Angeles, California 90025-1026
(303) 740-1980